

1 FENNEMORE CRAIG JONES VARGAS
2 Christopher Byrd (NV Bar No. 1633)
3 Anthony R. Ager (NV Bar No. 7969)
4 300 South Fourth Street, Suite 1400
5 Las Vegas, Nevada 89101
6 Telephone: (702) 692-8000
7 Facsimile: (702) 692-8099
aager@fclaw.com

E-Filed January 17, 2014

8 *Attorneys for Robert Freeman, as Trustee of the
9 Freeman Family Trust, Robert Ruyman and Frank Reed*

10 UNITED STATES BANKRUPTCY COURT

11 DISTRICT OF NEVADA

12 In re:
13 ROBERT F. DRESSER
14 MARYBETH DRESSER
15 Debtor(s).

Case No.: BK-14-10150-ABL

Chapter 7

**NOTICE OF APPEARANCE AND
REQUEST FOR NOTICE**

16 TO: THE CLERK OF THE BANKRUPTCY COURT, and

17 TO: THE DEBTOR AND ALL INTERESTED PARTIES:

18 Christopher Byrd, Esq. and Anthony R. Ager, Esq., of the law firm of FENNEMORE
19 CRAIG JONES VARGAS, counsel for Robert Freeman, as Trustee of the Freeman Family
20 Trust, Robert Ruyman and Frank Reed (collectively, the “Freeman Party”), enters their
21 appearance on the record in the above-captioned chapter 7 bankruptcy proceeding pursuant to
22 Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (“Bankruptcy Rule”), and pursuant
23 to Bankruptcy Rules 2002 and 3017(a) requests special notice of all hearings, actions, contested
24 matters, and adversary proceedings in this case, together with copies of all notices, pleadings,
25 motions, responses and other related materials that are issued or filed in connection with these
26 proceedings by the Court, Debtor, or other parties-in-interest, including copies of all plans of

1 reorganization and disclosure statements. All notices and copies in response to the foregoing,
 2 and pursuant to Bankruptcy Rule 2002, all notices required to be mailed pursuant to Bankruptcy
 3 Rule 2002, should be directed to:

4 FENNEMORE CRAIG JONES VARGAS
 5 Christopher Byrd (NV Bar No. 1633)
 6 Anthony R. Ager (NV Bar No. 7969)
 7 300 South Fourth Street, Suite 1400
 8 Las Vegas, Nevada 89101
 Telephone: (702) 692-8000
 Facsimile: (702) 692-8099
aager@fclaw.com
aharris@fclaw.com

9 Neither this paper nor any subsequent appearance, pleadings, claim, proof of claim,
 10 documents, suit, motion, nor any other writing or conduct, shall (1) expressly or impliedly
 11 designate the undersigned as agent for service of process on the Freeman Party; or (2) constitute
 12 a waiver of any of the following rights of the Freeman Party:

13 (a) Right to have any and all final orders in any and all non-core matters entered
 14 only after de novo review by the United States District Court Judge;

15 (b) Right to trial by jury in any proceeding as to any and all matters so triable herein,
 16 whether or not the same be designated legal or private rights, or in any case, controversy or
 17 proceeding relating hereto, notwithstanding the designation vel non of such matters as "core
 18 proceedings" pursuant to 28 U.S.C. § 157(b)(2)(H), and whether such jury trial right is pursuant
 19 to statute or the United States Constitution;

20 (c) Right to have the reference of this matter withdrawn by the United States District
 21 Court in any matter or proceeding subject only to mandatory or discretionary withdrawal; and

22 (d) Other rights, claims, actions, defenses, set-offs, recoupment, or other matters to
 23 which this party is entitled under any agreements or at law or in equity or under the United
 24 States Constitution.

25 All of the above rights are expressly reserved and preserved without exception and with
 26

1 no purpose of confessing or conceding jurisdiction in any way by this filing or by any other
2 participation in the above-captioned case and ancillary proceedings.

3 DATED this 17th day of January, 2014.

4 FENNEMORE CRAIG JONES VARGAS

5 /s/ Anthony R. Ager
6 Christopher Byrd (NV Bar No. 1633)
7 Anthony R. Ager (NV Bar No. 7969)
300 South Fourth Street, #1400
Las Vegas, Nevada 89101

8 *Attorneys for Robert Freeman, as Trustee
9 of the Freeman Family Trust, Robert Ruyman
and Frank Reed*

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26